

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROBERTO CLEMENTE JR., KIMBERLY
DSCHUHAN, RYAN NORTON, KAILEE
CLEMENTE, THE ROBERTO CLEMENTE JR.
FAMILY AGENCY, LLC,

Plaintiffs,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

Case No. 2:22-cv-00056

**DEFENDANT ALLSTATE INSURANCE COMPANY'S
APPENDIX OF ADDITIONAL RECORD MATERIALS
IN SUPPORT OF OPPOSITION TO PLAINTIFFS'
PARTIAL MOTION FOR SUMMARY JUDGMENT**

EXHIBIT	DOCUMENT
A	Deposition of William Baldy, November 15, 2023 (previously filed as ECF 106-4)
B	Exhibit 18 to Deposition of Kimberly Dschuhan (previously filed as ECF 106-23)
C	Deposition of Eric Copenhaver, December 6, 2023 (previously filed as ECF 106-22)
D	Deposition of John Tomaino, December 4, 2023 (previously filed as ECF 106-26)
E	Rule 30(b)(6) Deposition of Allstate Insurance Company, January 16, 2024 (previously filed as ECF 106-12)
F	Declaration of Mark Shokalook, March 18, 2024
G	Text messages between Eric Copenhaver and Kimberly Dschuhan, March 8, 2019 to November 6, 2020; Exhibit 8 to Plaintiffs' Statement of Facts ISO Partial Motion for Summary Judgment (incomplete text message exchange previously filed as ECF 106-17)
H	Undated Communication from Eric Ash to Kimberly Dschuhan, RCJ 4763
I	Deposition of Kimberly Dschuhan, October 14, 2023 (previously filed as ECF 106-1)
J	Exhibit 19 to Deposition of Kimberly Dschuhan (previously filed as ECF 106-24)
K	Exhibit 29 to Deposition of Kimberly Dschuhan (previously filed as ECF 106-28)
L	Ex. 8 to Deposition of Eric Copenhaver; Exhibit 7 to Plaintiffs' Statement of Facts in Support of Partial Motion for Summary Judgment, (previously filed as ECF 101-16)

M	Rule 30(b)(6) Deposition of Roberto Clemente Jr. Family Agency, January 30, 2024 (previously filed as ECF 106-3)
N	Exhibit 10 to Deposition of Kimberly Dschuhan (previously filed as ECF 106-7)
O	Exhibit 14 to Deposition of Kimberly Dschuhan (previously filed as ECF 106-10)
P	Exhibit 12 to Deposition of Kimberly Dschuhan (previously filed as ECF 106-9)
Q	Deposition of Rebecca Devenney (Kincade), December 13, 2023 (previously filed as ECF 106-32)
R	Deposition of Valerie Staudt, December 14, 2023 (previously filed as ECF 106-14)
S	Deposition of Justin Young, December 7, 2023
T	Deposition of Roberto Clemente Jr., October 18, 2023 (previously filed as ECF 106-8)
U	Deposition of Ryan Norton, November 10, 2023 (previously filed as ECF 106-13)
V	Exhibit 15 to Deposition of Roberto Clemente Jr. (previously filed as ECF 106-11)
W	Deposition of Kailee Clemente, November 7, 2023 (previously filed as ECF 106-25)
X	Exhibit 3 to Rule 30(b)(6) Deposition of Roberto Clemente Jr. Family Agency (DX32) (previously filed as ECF 106-27)
Y	Exhibit 6 to Deposition of Kimberly Dschuhan (previously filed as ECF 106-6)
Z	ALLSTATE_CLEMENTE_003000-48; Exhibit 16 to Plaintiffs' Statement of Facts ISO Partial Motion for Summary Judgment (previously filed as ECF 101-25)

Dated: March 26, 2024

Respectfully submitted,

By: /s/ Alan S. King

RILEY SAFER HOLMES & CANCILA LLP
 Alan S. King (admitted *pro hac vice*)
 (IL 6198223)
 Noreen H. Cull (admitted *pro hac vice*)
 (IL 6229417)
 Ariel Schepers Wilson (admitted *pro hac vice*)
 (IL 6316904)
 70 West Madison Street, Suite 2900
 Chicago, Illinois 60602
 Telephone: 312.471.8700
 Facsimile: 312.471.8701
aking@rshc-law.com
ncull@rshc-law.com
awilson@rshc-law.com

FISCHER & PHILLIPS LLP
 Brian D. Balonick (PA 89272)
 Erica G. Wilson (PA 316343)
 Six PPG Place, Suite 830
 Pittsburgh, PA 15222

Telephone: (412) 822-6633
Facsimile: (412) 774-6101
bbalonick@fisherphillips.com
ewilson@fisherphillips.com

Counsel for Defendant Allstate Insurance Company